

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

ERIC MARTIN, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

ALTISOURCE RESIDENTIAL CORPORATION,  
WILLIAM C. ERBEY, ASHISH PANDEY,  
KENNETH D. NAJOUR, ROBIN N. LOWE, AND  
RACHEL M. RIDLEY,

Defendants.

CASE No.: 1:15-CV-00024-WAL-GWC

CLASS ACTION

**PLAINTIFFS' MOTION FOR (I) AN  
AWARD OF ATTORNEYS' FEES  
AND REIMBURSEMENT OF  
LITIGATION EXPENSES; AND (II)  
INCENTIVE AWARDS TO  
PLAINTIFFS**

TO: ALL COUNSEL OF RECORD

Lead Plaintiff Lei Shi and Plaintiff Ashley Saunders (collectively, "Plaintiffs") move this honorable Court for an Order: (i) awarding attorneys' fees and reimbursement of litigation expenses; and (iii) granting Plaintiffs an incentive award.

Plaintiffs rely upon the annexed Brief in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation, the previously-filed Declaration of Adam M. Apton in Support of Unopposed Motion for Preliminary Approval of Settlement (Dkt. No. 218-2), the Supplemental Declaration of Adam M. Apton, Declaration of Kevin A. Rames, Supplemental Declarations of Plaintiffs Lei Shi and Ashley Saunders, and Declaration to Steven Straub.

Plaintiffs have also submitted a Proposed Order in connection with their Motion.

Dated: January 2, 2020

Respectfully submitted,

**K.A. Rames, P.C.**

s/ Kevin A. Rames, Esq.

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*Attorneys for Plaintiffs*

*and Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion and accompanying documents were served by Notice of Electronic Filing generated by CM/ECF, on January 2, 2020, on all counsel or parties of record registered in this action.

s/ Kevin A. Rames, Esq.

Kevin A. Rames (VI Bar No. 193)